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IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

CANDACE K. KANAHELE,

Defendant.

INDICTMENT

COUNTS 1-3: 31 U.S.C. § 5324(a)(3),  
Structuring a Transaction to Evade  
Reporting Requirement

Case: 2:22-cr-00276  
Assigned To : Barlow, David  
Assign. Date : 08/02/2022

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The Grand Jury Charges:

**COUNT 1**

31 U.S.C. § 5324(a)(3)  
Structuring a Transaction to Evade Reporting Requirement

On or about August 24, 2018, in the District of Utah,

CANDACE K. KANAHELE,

defendant herein, for the purpose of evading the reporting requirements of section 5313(a) of Title 31, United States Code, and the regulations promulgated thereunder, did knowingly structure or assist in structuring, or attempt to structure or assist in structuring, the following transactions with one or more domestic financial institutions:

<b>CURRENCY DEPOSIT AMOUNT</b>	<b>FINANCIAL INSTITUTION</b>	<b>BRANCH LOCATION</b>
\$7,000	Wells Fargo Acct. No. xxxx7902	140 W 800 N, Orem, UT
\$8,000	MACU Acct. No. xxxx6921-50	1219 S 800 E, Orem, UT

All in violation of Title 31, United States Code, Section 5324(a)(3).

**COUNT 2**

31 U.S.C. § 5324(a)(3)

Structuring a Transaction to Evade Reporting Requirement

On or about June 27, 2019, in the District of Utah,

CANDACE K. KANAHELE,

defendant herein, for the purpose of evading the reporting requirements of section 5313(a) of Title 31, United States Code, and the regulations promulgated thereunder, did knowingly structure or assist in structuring, or attempt to structure or assist in structuring, the following transactions with one or more domestic financial institutions:

<b>CURRENCY DEPOSIT AMOUNT</b>	<b>FINANCIAL INSTITUTION</b>	<b>BRANCH LOCATION</b>
\$6,300	Wells Fargo Acct. No. xxxx7902	456 E 1150 S, Orem, UT
\$2,900	Wells Fargo Acct. No. xxxx7902	77 N State, Orem, UT (ATM)
\$500	Wells Fargo Acct. No. xxxx7902	140 W 800 N, Orem, UT (ATM)
\$500	MACU Acct. No. xxxx6921-50	1219 S 800 E, Orem, UT

All in violation of Title 31, United States Code, Section 5324(a)(3).

**COUNT 3**

31 U.S.C. § 5324(a)(3)

Structuring a Transaction to Evade Reporting Requirement

On or about June 29, 2020, in the District of Utah,

CANDACE K. KANAHELE,

defendant herein, for the purpose of evading the reporting requirements of section 5313(a) of Title 31, United States Code, and the regulations promulgated thereunder, did knowingly structure or assist in structuring, or attempt to structure or assist in structuring, the following transactions with one or more domestic financial institutions:

<b>CURRENCY DEPOSIT AMOUNT</b>	<b>FINANCIAL INSTITUTION</b>	<b>BRANCH LOCATION</b>
\$500	MACU Acct. No. xxxx6921-50	1340 N State St Orem, UT (ATM)
\$3,000	Wells Fargo Acct. No. xxxx7902	140 W 800 N Orem, UT (ATM)
\$3,000	Wells Fargo Acct. No. xxxx7902	140 W 800 N Orem, UT (ATM)
\$3,000	Wells Fargo Acct. No. xxxx7902	140 W 800 N Orem, UT (ATM)
\$2,700	Wells Fargo Acct. No. xxxx7902	140 W 800 N Orem, UT (ATM)
\$9,300	Wells Fargo Acct. No. xxxx7902	140 W 800 N Orem, UT
\$8,900	Wells Fargo Acct. No. xxxx7902	456 E 1150 S Orem, UT

All in violation of Title 31, United States Code, Section 5324(a)(3).

**NOTICE OF INTENT TO SEEK FORFEITURE**

Pursuant to 31 U.S.C. § 5317(c)(1), upon conviction of any offense violating 31 U.S.C. § 5324, the defendant shall forfeit to the United States of America all property,

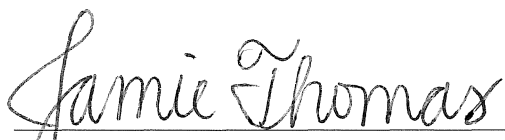
real or personal, involved in the offense and any property traceable thereto. The property to be forfeited includes, but is not limited to:

- Real property located at 345 North 20 West, Vineyard, Utah;
- A money judgment equal to the value of any property not available for forfeiture as a result of any act or omission of the defendant(s) for one or more of the reasons listed in 21 U.S.C. § 853(p);
- Substitute property as allowed by 28 U.S.C. § 2461(c) and 21 U.S.C. § 853(p).

A TRUE BILL:

  
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FOREPERSON OF GRAND JURY

TRINA A. HIGGINS  
United States Attorney

  
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JAMIE Z. THOMAS  
Assistant United States Attorney